

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
sgizer@earlysullivan.com

2 Sophia S. Lau, Esq., Nevada Bar No. 13365
slau@earlysullivan.com

3 EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

4 8716 Spanish Ridge Avenue, Suite 105

Las Vegas, Nevada 89148

5 Telephone: (702) 331-7593

Facsimile: (702) 331-1652

6 Kevin S. Sinclair, NV Bar No. 12277

7 ksinciar@sinclairbraun.com

SINCLAIR BRAUN LLP

8 16501 Ventura Blvd, Suite 400

Encino, California 91436

9 Telephone: (213) 429-6100

Facsimile: (213) 429-6101

10 Attorneys for Defendant

11 FIDELITY NATIONAL TITLE INSURANCE COMPANY

12 DESIGNATED LOCAL COUNSEL FOR SERVICE OF

13 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

14 Janet Trost, Esq.

15 501 S. Rancho Drive

Suite H-56

Las Vegas, Nevada 89106

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 U.S. BANK, N.A.,

19 Plaintiff,

20 vs.

21 FIDELITY NATIONAL TITLE
INSURANCE COMPANY

22 Defendant.

Case No.: 2:22-CV-01905-JAD-DJA

**STIPULATION AND ORDER
CONTINUING DEADLINE TO
RESPOND TO THE COMPLAINT**

SECOND REQUEST

24 COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”) and
25 plaintiff U.S. Bank, N.A. (“U.S. Bank”), by and through their respective attorneys of record,
26 which hereby agree and stipulate as follows:

27 1. On October 31, 2022, U.S. Bank filed its complaint in the Eighth Judicial District

1 Court for the State of Nevada;

2 2. On November 10, 2022, Fidelity removed the instant action to the United States
3 District Court for the State of Nevada (ECF No. 1);

4 3. U.S. Bank is considering voluntarily amending its complaint in this action;

5 4. Fidelity's response to the Complaint is currently due on January 11, 2023;

6 5. Counsel for the Parties request that Fidelity's deadline to respond to the complaint
7 be extended by thirty (30) days, through and including Friday, February 10, 2023, to afford U.S.
8 Bank additional time to consider amending its complaint;

9 6. The parties therefore agree and stipulate that Fidelity's deadline to respond to the
10 complaint shall be continued through and including Friday, February 10, 2023.

11 7. Counsel for U.S. Bank does not oppose the requested extension;

12 8. This is the second request for an extension made by counsel for Fidelity, which is
13 made in good faith and not for the purposes of delay.

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 9. This stipulation is entered into without waiving any of Fidelity's objections under
2 Fed. R. Civ. P. 12.

3 **IT IS SO STIPULATED** that Fidelity's deadline to respond to the complaint is
4 hereby continued through and including February 10, 2023.

5 Dated: January 11, 2023

SINCLAIR BRAUN LLP

7 By: /s/-Kevin S. Sinclair

8 KEVIN S. SINCLAIR
9 Attorneys for Defendant
FIDELITY NATIONAL TITLE INSURANCE
COMPANY

10 Dated: January 11, 2023

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Lindsay D. Dragon

13 LINDSAY D. DRAGON
14 Attorneys for Plaintiff
U.S. BANK, N.A.

15 **IT IS SO ORDERED.**

16 Dated this 12th day of January, 2023.

17 
18 DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE